

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**GREG ABBOTT, in his capacity as Governor
of the State of Texas, and the STATE OF
TEXAS,**

Defendants.

CIVIL ACTION NO. 1:23-cv-00853-DAE

**DECLARATION OF JOHNATHAN STONE IN OPPOSITION TO
MOTION FOR RECONSIDERATION**

1. My name is Johnathan Stone. I am the Division Chief of the Consumer Protection Division, for the Office of the Texas Attorney General. I represent the Defendants in the above-captioned matter.
2. I was involved in retaining Experts for the Defendants.
3. Mr. Rodney Scott was retained as a Consulting Expert by the Defendants, effective May 6, 2024.
4. Mr. Scott was serving as a Consulting Expert on June 4, 2024, when I sent the email communication to Defendants' Experts that is the subject of United States' Motion for Reconsideration of Order Granting in Part and Denying in Part Plaintiff's Motion to Compel. ECF No. 233.
5. The redacted information in the June 4, 2024, communication is privileged and is not the subject of Mr. Scott's testimony at trial.

I hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge and information.

Signed this 28th day of October 2024.

/s/ Johnathan Stone

JOHNATHAN STONE

OFFICE OF THE TEXAS ATTORNEY GENERAL